

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|                                              |   |                                                             |
|----------------------------------------------|---|-------------------------------------------------------------|
| <b>UNITED STATES OF AMERICA</b>              | : | <b>CRIMINAL NO.</b> _____                                   |
|                                              | : |                                                             |
|                                              |   | <b>DATE FILED:</b> _____                                    |
|                                              |   | —                                                           |
| <b>v.</b>                                    | : |                                                             |
|                                              | : | <b>VIOLATIONS:</b>                                          |
|                                              | : | <b>8 U.S.C. § 1326(a) and (b)(2) (illegal reentry after</b> |
| <b>EURIPIDES MORALES-SANCHEZ</b>             | : | <b>deportation - 1 count)</b>                               |
| <b>a/k/a “Jose Antonio Medina-Fernandez”</b> | : | <b>18 U.S.C. § 1542 (false statement in U.S. passport</b>   |
|                                              |   | <b>application - 1 count)</b>                               |
|                                              |   | <b>18 U.S.C. § 911 (making a false claim of U.S.</b>        |
|                                              |   | <b>citizenship - 1 count)</b>                               |

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about April 8, 2005, in Philadelphia, in the Eastern District of Pennsylvania,  
defendant

**EURIPIDES MORALES-SANCHEZ,  
a/k/a “Jose Antonio Medina-Fernandez,”**

an alien who had previously been deported from the United States on or about December 18,  
2002, was found in the United States without first applying to the Attorney General of the United  
States or his successor, the Secretary for Homeland Security (Title 6, United States Code,  
Sections 202(3), (4) and 557), for permission to reapply for admission, and without receiving in  
response the express consent of the Attorney General or his successor to reapply for admission.

In violation of Title 8, United States Code, Section 1326(a), (b)(2).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 9, 2004, in Bethlehem, in the Eastern District of Pennsylvania, defendant

**EURIPIDES MORALES-SANCHEZ,  
a/k/a “Jose Antonio Medina-Fernandez,”**

willfully and knowingly made false statements in an application for a passport with the intent to induce and secure the issuance of a passport under the authority of the United States, for his own use or the use of another, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendant MORALES-SANCHEZ stated that his name was Jose Antonio Medina-Fernandez and that he was born in Puerto Rico and was a citizen of the United States, knowing that these statements were false.

In violation of Title 18, United States Code, Section 1542.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 9, 2004, in Bethlehem, in the Eastern District of Pennsylvania,  
defendant

**EURIPIDES MORALES-SANCHEZ,  
a/k/a “Jose Antonio Medina-Fernandez,”**

an alien and citizen of the Dominican Republic, falsely and willfully represented himself to be a  
citizen of the United States.

In violation of Title 18, United States Code, Section 911.

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**PATRICK L. MEEHAN**  
**United States Attorney**